

REMARKS/ARGUMENTS

Claims 1-42 and 44-45 stand in the present application, claims 1, 22 and 38 having been amended and claim 43 having been canceled. Reconsideration and favorable action is respectfully requested in view of the above amendments and the following remarks.

In the final Office Action, the Examiner rejected claims 1-16 and 21-45 under 35 U.S.C. § 102(b) as being anticipated by Dondeti et al. ("Dondeti"), and rejected claims 17-20 under 35 U.S.C. § 103(a) as being unpatentable over Dondeti. In view of the above claim amendments Applicant respectfully submits that the present claims now more clearly patentably define over the cited art.

More particularly, the claims have been amended as suggested by the Examiner in the Advisory Action to more clearly define "offset" as the term is defined in the present specification. An "offset" is clearly defined in the present application at Figure 4 and page 12, lines 23 onwards (particularly lines 27-28). As explained in the present application, an offset message can be thought of in terms of the distance, or value difference, between two chains of keys. A first chain is generated from the key X0, and a second chain generated from Y0. Both chains are formed by applying the one-way function (f), so that "the user knowing the root key Y0 of chain Y can, given the correct offset message, recover X2" (page 13 lines 23 and 24). As graphically shown in Figure 4, it is possible to "move" from Y1 to obtain X2 if the offset value is supplied. The offset is calculated by the central key server, since only the server has knowledge of the distance between the two chains.

A secure version of this method of moving from one value to another is shown in Figure 5, wherein an intermediate key is used temporarily and only to allow generation of e.g. X2 from Y1 (page 14 lines 4 to 31). In a tree structure implementation such as that shown in Figure 6, two nodes in a keypath e.g. K1 and K12, may be said to correspond to Y1 and X2 of Figure 5, in that they are part of two unrelated one-way function chains: page 17 lines 24 to 31.

Thus if the value of node K1 is "10" and the offset value is "5", it is then possible to "move" to node 12 which has a value of "15". These values are of course crude and inaccurate as the offset is a binary number and moreover is mixed using, e.g., an XOR function before the move from K1 to K12 is complete - and so are purely to assist understanding.

An offset message which relates to a specific key (e.g. Offset_m1 relates to key K_m1) is broadcast by the central key server to the entire group: page 19 lines 3 to 12. Because only the member of the group having knowledge of the key K_m1 can use the particular offset message Offset_m1, the offset message may be transmitted in plaintext or otherwise without need for encryption. This is a significant advantage over prior art methods which reduces the amount of bandwidth and computation required, especially at the member end.

In Dondeti, as in the subject invention, keys are updated upon a join event. Instead of the system broadcasting offset values in an unencrypted format however, Dondeti provides that key updating is carried out by the sending of various blinded and unblinded keys which are freshly generated. See Dondeti at column 5, lines 51-64. Significantly, all keys need to be encrypted for transmission. See Dondeti at column 5,

lines 64 and 65. Thus it is not possible in the Dondeti method to broadcast the equivalent of Applicant's offset (which is used to generate the updated keys) in an unencrypted form, as required by, e.g., claim 1.

Even if the Examiner correctly alleges that the binary ID of Dondeti can constitute an offset, the binary ID of Dondeti clearly does not meet the above described amended definition of offset in the present claims. The binary ID of Dondeti does nothing more than identify a member (22) to define key associations groups (22a). See Dondeti at column 3, lines 30 and 31. These groups are stated in Dondeti (column 2, lines 44 and 45) as merely a group composed of a number of members.

Dondeti simply does not in any way teach or suggest the use of anything similar to the offset value required by the present amended claims in the generation of key updates in a key distribution system, let alone that the offsets are broadcast in an unencrypted form. Thus, Dondeti fails to teach or suggest amended independent claims 1, 22 and 38. Accordingly, independent claims 1, 22 and 38 and their respective dependent claims now more clearly patentably define over Dondeti.

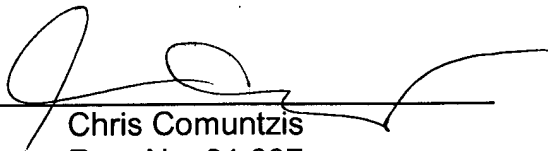
Therefore, in view of the above remarks, it is respectfully requested that the application be reconsidered and that all of claims 1-42 and 44-45, now standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

SOPPERA
Appl. No. 10/507,114
January 6, 2009

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____



Chris Comuntzis
Reg. No. 31,097

CC:Imr
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100